

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**MARK E. FELGER (MF9985)**  
**JERROLD N. POSLUSNY (JP7140)**  
**COZEN O'CONNOR**  
LibertyView, Suite 300  
457 Haddonfield Road  
Cherry Hill, NJ 08002  
(856) 910-5000  
Proposed Attorneys for the Debtors

In re:

SHAPES/ARCH HOLDINGS L.L.C., et al.,

Debtors.

Case No. 08-

Judge:

Chapter: 11

**INTERIM ORDER: (I) PROHIBITING UTILITY COMPANIES FROM  
DISCONTINUING, ALTERING OR REFUSING SERVICE; (II) DEEMING  
UTILITY COMPANIES TO HAVE ADEQUATE ASSURANCE OF PAYMENT;  
AND (III) ESTABLISHING PROCEDURES FOR RESOLVING REQUESTS  
FOR ADDITIONAL ASSURANCE PURSUANT TO 11 U.S.C. § 366**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby  
**ORDERED.**

Page 2

Shapes/Arch Holdings L.L.C., et al.

Case No. 08-

Interim Order: (i) Prohibiting Utility Companies from Discontinuing, Altering or Refusing Service; (ii) Deeming Utility Companies to Have Adequate Assurance of Payment; and (iii) Establishing Procedures for Resolving Requests for Additional Assurance Pursuant to 11 U.S.C. § 366

---

Upon consideration of the verified motion (the “Motion”)<sup>1</sup> of the above-captioned debtors and debtors-in-possession (the “Debtors”), for entry of interim and final orders pursuant to 11 U.S.C. § 366: (i) prohibiting the Utility Companies from altering, refusing or discontinuing services to the Debtors on the basis of the commencement of these cases or on account of any unpaid invoices for services provided prior to the Petition Date; (ii) deeming the Utility Companies adequately assured of future performance on the basis of the establishment of a Utility Deposit; and (iii) establishing procedures for resolving requests for additional assurance of payment, notice of the Motion being sufficient under the circumstances; and sufficient cause appearing therefor, it is ORDERED:

1. That the Motion is GRANTED.
2. That until such time as the Final Order is entered by the Court, all Utility Companies are prohibited from: (i) altering, refusing or discontinuing services to, or discriminating against, the Debtors on the basis of the commencement of these cases or on account of any unpaid invoice for services provided prior to the Petition Date; and (ii) requiring payment of a deposit or receipt of any other security for continued services as a result of the Debtors’ bankruptcy filings or any outstanding prepetition invoices other than as set forth in the Motion.

---

<sup>1</sup> Unless otherwise defined herein, all capitalized terms shall have the same meanings ascribed to them in the Motion.

Page 3

Shapes/Arch Holdings L.L.C., et al.

Case No. 08-

Interim Order: (i) Prohibiting Utility Companies from Discontinuing, Altering or Refusing Service; (ii) Deeming Utility Companies to Have Adequate Assurance of Payment; and (iii) Establishing Procedures for Resolving Requests for Additional Assurance Pursuant to 11 U.S.C. § 366

---

3. The Motion and this Interim Order shall be served, via first-class mail, on each Utility Company the Debtors believe could be affected by the Motion and all other parties required to receive service under Federal Rule of Bankruptcy Procedure 2002 within five (5) days of entry of this Interim Order.

4. The deadline by which objections to the Motion and the Final Order must be filed by is \_\_\_\_\_, at 4:00 p.m.

5. A final hearing, if required, on the Motion will be held on \_\_\_\_\_ at \_\_\_\_\_ a.m/p.m.

6. If no objections are filed to the Motion, the Court may enter the Final Order without further notice or hearing.

CHERRY\_HILL\430617\1 077771.000